

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
International Priority Airmail, Commercial ePacket,  
Priority Mail Express International, Priority Mail  
International & First-Class Package International  
Service with Reseller Contract 2 (MC2020-169)  
Negotiated Service Agreements

Docket No. CP2020-192

PUBLIC REPRESENTATIVE COMMENTS ON NOTICE OF  
POSTAL SERVICE FILING MODIFICATION TWO TO  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL INTERNATIONAL &  
FIRST-CLASS PACKAGE INTERNATIONAL SERVICE WITH RESELLER  
CONTRACT 2

(December 16, 2022)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Filing of Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Contract 2.<sup>2</sup>

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<sup>1</sup> Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, December 9, 2022 (Notice).

<sup>2</sup> Notice of the United States Postal Service of Filing Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Contract 2. December 8, 2022. (Notice).

The Postal Service's Notice includes a certified statement as required by 39 C.F.R. § 3035.105(c)(2), a public (redacted) version of Modification Two to Contract 2, and supporting financial data.

In Order No. 5571, the Commission approved the Postal Service's request to add a new product identified as International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Contract 2 to the Competitive List.<sup>3</sup> In Order No. 5824, the Commission approved Modification One to the contract.<sup>4</sup> Modification Two revises Articles 2, 3, 7, 8, 10, 12, 14, 20, 22, and 34 of the Agreement revises Article 20 so that the contract will remain in effect until May 31, 2024. It also adds annexes 1B, 2B, 3B, 4B, 5B, 6B, 7B, 8B and 9B to the Agreement. *Request at 1.*

## COMMENTS

The Public Representative has reviewed the Postal Service's Notice of Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Contract 2. Based upon that review, the Public Representative concludes that Contract 2, as modified, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

Finally, the Postal Service must file revenue and cost data for Contract 2 in future Annual Compliance Reports. This data will permit the Commission to annually review the financial results for Contract 2 for compliance with 39 U.S.C. § 3633(a). The Public

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<sup>3</sup> See Order No. 5571 Order Adding International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Contract 2 to the Competitive Product List, Docket No. MC2020-169 and CP2020-192, June 30, 2020.

<sup>4</sup> See Order No. 5824 Order Approving Modification One to IPA, Commercial ePacket, PMEI, PMI & FCPIS with Reseller Negotiated Service Agreements. Docket No. CP2020-192, January 21, 2021.

Representative respectfully submits the foregoing comments for the Commission's consideration.

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